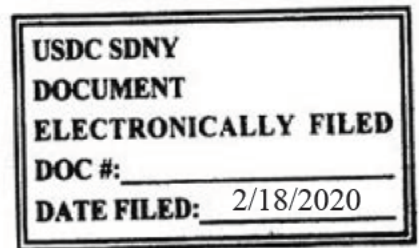


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February 18, 2020

Via ECF

Hon. Analisa Torres, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: Second Joint Request for Four Week Extension *Nunc Pro Tunc* to Submit
Joint Fairness Letter with Executed Settlement Agreement
19-cv-05145 *Wang v. CLL Brothers, Inc. et al***

Dear Honorable Judge Torres:

This office represents Plaintiffs in the above-captioned matter. Plaintiffs write jointly with Defendants to request for a four (4) week extension *nunc pro tunc* from February 13, 2020 to March 13, 2020 submit the executed Joint Fairness with Settlement Agreement for Your Honor's judicial approval.

On January 23, 2020, the Court directed the parties to submit their joint fairness letter and settlement agreement by February 13, 2020 (Dkt. No. 31). Despite the parties' effort, we were not able to submit the documents by the court-ordered deadline.

Plaintiff's wife had informed this office that Plaintiff is currently in China and his travel is restricted due to the worldwide outbreak of Coronavirus. Upon the circumstances, his return to the United States has been delayed, and he, therefore, is not able to execute the settlement agreement. Furthermore, the U.S. authority has set forth a fourteen-day quarantine for all individuals returning to the states from China, which expectedly would cause further delay on the Plaintiff's travel itinerary. As aforementioned in the previous letter, we sent a full copy of the settlement agreement to the Plaintiff via WeChat, but his uncomfortable signing prior to an in-person consultation with us at the office. We have been in contact with Plaintiff's wife, who informed us that his phone was broken and we were informed by the wife with the following message: "Right now the [coronavirus] outbreak is dangerous, [Mr. Wang] has ordered a plane ticket to return [to the United

States] at the end of the month. I do not know if there are any changes [there]. When he is there [in China] there are substitutes to go for work in his stead.”

For the foregoing reasons, the parties respectfully request that the deadline to submit joint fairness letter and executed settlement agreement be extended *nunc pro tunc* from February 13, 2020 to March 13, 2020. Besides, this office will continue to keep the court apprised of the latest development.

We thank the Court for its continued attention to this matter.

Respectfully submitted,
TROY LAW, PLLC

/s/ John Troy
John Troy
Attorney for Plaintiffs

JT/sm

cc: via ECF
all counsel of record

GRANTED. By **March 13, 2020**, the parties shall submit their joint fairness letter and executed settlement agreement.

SO ORDERED.

Dated: February 18, 2020
New York, New York



ANALISA TORRES
United States District Judge